

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

RUBY FREEMAN and
WANDREA' MOSS,

Plaintiffs,

-against-

RUDOLPH W. GIULIANI,

Defendant,

-and-

ANDREW H. GIULIANI,

Intervenor-
Defendant.

No. 24-MC-353-LJL

**INTERVENOR-DEFENDANT ANDREW H. GIULIANI'S PRETRIAL DISCLOSURES
PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 26(a)(3)**

Pursuant to Rule 26(a)(3) of the Federal Rules of Civil Procedure, Intervenor-Defendant Andrew H. Giuliani ("Andrew Giuliani"), by his undersigned counsel, submits the following pretrial disclosures.

I. Witnesses [Fed. R. Civ. P. 26(a)(3)(i), (ii)]

Andrew Giuliani provides the following list of potential trial witnesses for his case-in-chief:

Name	Address/Contact	Category
Andrew H. Giuliani	Previously provided / party	Intervenor-Defendant expects to present
Rudolph W. Giuliani	Previously provided / party	Intervenor-Defendant expects to present

Name	Address/Contact	Category
Sean Kalin	Previously provided	Intervenor-Defendant expects to present (via sworn declaration on stipulation by parties)

Andrew Giuliani reserves the right to call additional witnesses to rebut any testimony or other evidence offered by Plaintiffs.

II. Documents or Other Exhibits [Fed. R. Civ. P. 26(a)(3)(iii)]

Andrew Giuliani provides the following list of potential exhibits for his case in chief:

Bates No.	Date	Document Description	Category
AHG0000001	May 25, 2018	Delta Airlines flight receipt	Intervenor-Defendant may offer if need arises
AHG0000002-3	May 26, 2018	Photographs of Rudolph, Andrew, and Zivile Giuliani with New York Yankees World Series rings (“WS Rings”)	Intervenor-Defendant expects to offer
AHG0000004-5	May 8, 2019	Photographs of Andrew Giuliani’s hand with WS Ring	Intervenor-Defendant may offer if need arises
AHG0000006-7	Jan. 26-27, 2024	Screen shots of text messages between Andrew Giuliani and Gary C. Fischhoff, Esq.	Intervenor-Defendant expects to offer

This list does not include all exhibits that Andrew Giuliani will use on cross-examination or on rebuttal. Furthermore, Andrew Giuliani reserves the right to amend and/or supplement this list with additional documents, including but not limited to any documents provided in discovery and deposition transcripts not yet available, that may become necessary exhibits at the trial.

Dated: New York, NY
December 19, 2024

LOWENSTEIN SANDLER LLP

By: /s/ Scott B. McBride

Scott B. McBride

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Counsel for Intervenor-Defendant

Andrew H. Giuliani

CERTIFICATE OF SERVICE

I hereby certify that on December 19, 2024, I caused the foregoing document to be served via e-mail upon counsel of record.

/s/ Scott B. McBride
Scott B. McBride